

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

THOMAS COREY PAYNE, and)	Civil Action No.: <u>2:17-cv-2313-PMD</u>
KAYLA HARRIS, Individually)	
and on Behalf of All Others Similarly)	
Situated,)	
Plaintiffs,)	
)	
v.)	
)	
AMAZON.COM, INC.,)	
)	
Defendant.)	
)	

**PLAINTIFFS' RESPONSES TO
LOCAL RULE 26.01 INTERROGATORIES**

Plaintiffs hereby respond to the Local Rule 26.01 Interrogatories as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: None known.

(B) As to each claim, state whether it should be tried by jury or nonjury and why.

RESPONSE: Plaintiffs request a jury trial on all claims for damages because a jury trial is available as a matter of right.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Not applicable. Plaintiffs are individuals.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: A substantial part of the events or omissions giving rise to the claims in the Complaint occurred in this division. Plaintiffs' claims are asserted in the Charleston Division because Plaintiffs reside in this Division, Plaintiffs' claims arose in this Division, and Defendant transacts business and contracted to supply goods in this Division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: No, not related to any other matter.

Dated: August 29, 2017

Respectfully submitted,

MCGOWAN, HOOD & FELDER, LLC

s/ James L. Ward, Jr.

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**pro hac vice application forthcoming*